

LAW OFFICE OF
JOSEPH S. WEIMER
975 TWO CHATHAM CENTER
PITTSBURGH, PENNSYLVANIA 15219
(412) 338-3184
FAX (412) 471-8748

JOSEPH S. WEIMER
WALTER C. FADREWSKI
DANIEL T. MOSKAL
F. DAVID DERMOTTA
MICHAEL E. RELICH
EDMOND R. JOYAL, JR.
SUSAN D. GARRARD
DAVID J. NICHOLS

Writer's Direct Dial: (412) 338-3098

January 31, 2006

VIA FACSIMILE

Timothy D. McNair, Esquire
Law Office of Timothy D. McNair
821 State Street
Erie, PA 16501

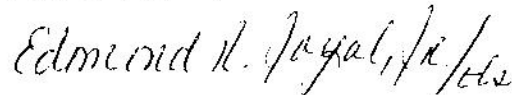
***RE: Abby Conley v. County of Erie, et al.
U.S. District Court for W. District – No. 05-CV-76 E***

Dear Mr. McNair:

I am currently out of the office but I understand you faxed a letter to my office on today's date regarding the depositions of Amy Jones and Gerald Villella scheduled for February 2, 2006. Please be advised that the witnesses are available on February 2nd and a room is reserved. Your letter indicates that you are not available on February 2, 2006, and at your request I will be more than happy to reschedule the depositions provided, you will not object to any depositions being taken after the February 3, 2006 discovery deadline in this case. Due to the upcoming discovery deadline, if I do not hear from you within 24 hours with regard to this matter, the depositions scheduled for February 2, 2006 will go forward as scheduled in order to meet the Court's discovery deadline.

If you have any questions or concerns regarding this matter, please do not hesitate to contact me.

Very truly yours,



Edmond R. Joyal, Jr.

cc: Anthony Angelone, Esquire
Mark R. Lane, Esquire